

SHEBELL & SHEBELL^{LLC}
ATTORNEYS AT LAW

Thomas F. Shebell, III*

April 26, 2023

Mark T. Apostolou, Jr. * **Via Efiling**

Danielle S. Chandonnet** Honorable Jose R. Almonte, U.S.M.J.

John H. Sanders, II* Martin Luther King Building & U.S. Courthouse
50 Walnut Street Room 4015
Newark, NJ 07101

Michelle C. Shebell
Christian R. Mastondrea

OF COUNSEL

Raymond P. Shebell, Sr.

Thomas F. Shebell, Jr. **

Philip G. Auerbach

Victor Rallo, Jr.

Re: Echevarria v. County of Essex, et al.
Civil Action No.: 2:21-cv-16609
Our File No.: 52611

Dear Judge Almonte:

IN MEMORIAM

Thomas F. Shebell, Sr.
(1927-1986)

This firm represents the Plaintiff Moises Echevarria in the above captioned matter. I have reached out to counsel for the defense to provide an update concerning discovery in this matter.



*Certified by the Supreme Court
of NJ as a Civil Trial Attorney

** Member NJ & NY Bars

† License in Illinois

The parties completed the deposition of the Plaintiff in this case, which was conducted remotely. In addition, the Plaintiff provided a settlement demand to the Defendant. The Plaintiff provided notices for depositions and also the categories of Rule 30(b)(6) witnesses for depositions, but the parties have not been able to arrive at an agreed upon date to conduct the defense depositions. Accordingly, it is requested by the Plaintiff that the Court provide instruction to the parties requiring that the defense provide dates by a date certain, so that we can proceed.

655 Shrewsbury Ave.
Suite 314
Shrewsbury, NJ 07702

Thank you again for the Court's assistance with the discovery issues in this case.

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Respectfully Submitted,

JOHN H. SANDERS, II

JHS/Imp

cc: Alan Ruddy, Esq., Assistant County Counsel
Stephen D. Holtzman, Esq.
Jeffrey McClain, Esq.